

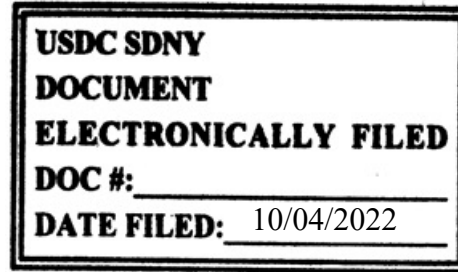
LEE LITIGATION GROUP, PLLC

148 WEST 24TH STREET, EIGHTH FLOOR
NEW YORK, NY 10011
TEL: 212-465-1180
FAX: 212-465-1181
INFO@LEELITIGATION.COM

WRITER'S DIRECT: 212-465-1188
cklee@leelitigation.com

Via ECF

The Honorable Katharine H. Parker, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007



ber 30, 2022

Re: *Ortiz et al v. Eskina 214 Corp. et al.*
Case No. 1:21-cv-01537 (ALC) (KHP)

Dear Judge Parker:

The Parties met and conferred on September 23, 2022, regarding Defendants production of outstanding discovery documents. On this call, Defense counsel, Mr. Mayol, expressed his concerns with his clients' ability to produce the outstanding discovery documents. Mr. Mayol informed Plaintiffs that his clients were not responding to his requests and communications, and that he may withdraw as Defendants counsel. Mr. Mayol gave Plaintiffs permission to file this letter requesting a discovery dispute conference if Defendants could not produce their outstanding documents by September 30, 2022.

Since the meet and confer on September 23, 2022, Plaintiffs have not heard back nor received any discovery documents from Mr. Mayol or Defendants. Therefore, Plaintiffs respectfully request a discovery dispute conference to prevent further delay of this case. Furthermore, Plaintiffs request that the Court compel Defendants to produce all outstanding discovery documents, compel Defendant Ismael Garcia to be deposed as soon as possible, and sanction Defendants for further delaying this case.

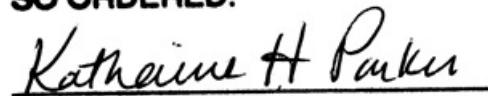
Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF

The Court thanks Counsel for the update. The parties shall be prepared to discuss at the conference scheduled for October 24, 2022 at 11:00 am.

SO ORDERED:


HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

10/04/2022